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November 18, 2003

HAND DELIVERY



Paul B. Martins
HELMER, MARTINS & MORGAN CO., LPA
Fourth & Walnut Centre, Suite 1900
105 East 4th Street
Cincinnati, OH 45202-4008

RE: The Estate of Roger D. Owensby v. City of Cincinnati, et al.

Dear Paul:

Enclosed are the following responses to your outstanding discovery request:

- 1) Audiotape of Patrick Caton's 3/22/02 interview with OMI;
- 2) Transcript of Jason Hodge's 5/2/02 interview with IIS;
- 3) Transcript of Jason Hodge's 5/14/02 interview with IIS;
- 4) Transcript of Patrick Caton's 3/21/02 interview with IIS;
- 5) Transcript of R. Blaine Jorg's 3/11/02 interview with IIS;
- 6) Table of Contents for the Cincinnati Police Department's Procedure Manual. We will be happy to provide copies of any pertinent policies in effect on January 7, 2000 upon your review of the Table of Contents;
- 7) Organizational Chart for the Cincinnati Police Department;
- 8) The MDT data was provided in the original production of documents and is numbered C002092 through C002107.

We are working on the remaining requests and will have responses to you by Friday, November 21, 2003.

FREUND, FREEZE & ARNOLD

Paul B. Martins
November 18, 2003
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Please call if you have any questions. Thank you for your cooperation.

Very truly yours,

FREUND, FREEZE & ARNOLD

A handwritten signature in black ink, appearing to read 'Neil F. Freund', is written over the printed name.

Neil F. Freund

CSS

c: Mark Tillar, Esq.
John Helbling, Esq.
Don Hardin, Esq.
Wilson Weisenfelder, Jr., Esq.
Dale Stalf, Esq.
Ravert Clark, Esq.
Geri Geiler, Esq.
Julie Bissinger, Esq.



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November 24, 2003

HAND DELIVERY

Paul B. Martins
HELMER, MARTINS & MORGAN CO., LPA
Fourth & Walnut Centre, Suite 1900
105 East 4th Street
Cincinnati, OH 45202-4008

COPY

RE: The Estate of Roger D. Owensby v. City of Cincinnati, et al.

Dear Paul:

Enclosed are the following documents that supplement our discovery responses:

- 1) Transcript of Brian Brazile's 3/20/02 interview with IIS;
- 2) Transcript of Shirley Browner's 3/18/02 interview with IIS;
- 3) Transcript of William Todd Bruner's 4/15/02 interview with IIS;
- 4) Transcript of Alexander Hasse's 3/12/02 interview with IIS;
- 5) Transcript of David Hunter's 3/14/02 interview with IIS;
- 6) Transcript of Abraham Lawson's 3/13/02 and 5/1/02 interviews with IIS;
- 7) Transcript of Darren Sellers' 3/15/02 interview with IIS;
- 8) Transcript of Victor Spellens' 3/13/02 interview with IIS;
- 9) Transcript of William Pete Watts' 3/19/02 interview with IIS;
- 10) Transcript of Steven Williams' 3/19/02 interview with IIS;
- 11) Documents concerning discipline, bates numbered C-004001 through C-004203.

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Paul B. Martins
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- 12) Videotape of R. Blaine Jorg's 3/11/02 interview with IIS. The written transcript has been previously provided.

The prosecutor's file pertaining to the criminal trial of Patrick Caton cannot be found. We have checked with the Clerk of Court's office to see if they had a copy, they do not. If the file is located, we will provide you copies of the exhibits as requested.

We are not in possession of a transcript of the radio communications of Officer Caton on November 7, 2000 as requested in your October 13, 2003 correspondence.

There are no digital files of the photographs as requested in your October 24, 2003 correspondence.

Additionally, your letter of 10/24/03 references an audiotape of an IIS interview with Patrick Caton on 11/18/02. The only 11/18/02 audiotape concerning Officer Caton is his disciplinary hearing. The City did not transcribe the proceeding.

Please call if you have any questions. Thank you for your cooperation.

Very truly yours,

FREUND, FREEZE & ARNOLD

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Neil F. Freund

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